



EVAPCO, INC.

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Mr. Bryan Alcorn
California Energy Commission
1516 Ninth Street, MS-25
Sacramento, CA 95814

Dear Mr. Alcorn,

This is in regard to the proposed revisions to the California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 1 and Part 6 (California Energy Code), 2005 Building Energy Efficiency Standards. In particular, on page 4 of 20 of the Notice of Proposed Action, the section titled: "Performance Requirements for Heat Rejection Equipment (§ 112, Table 112-G). This proposed change reads: "Factory assembled cooling towers will be required to be certified by the Cooling Technology Institute to meet the requirements of CTI STD-201."

I believe the wording of this proposed change will not properly serve the people of California as it is written and should be changed. Often, cooling tower manufacturers are required to supply custom options on standard units. Many times, these options may be platforms that are necessary for safe access to maintain the equipment. However, any option which is in the moving air-stream voids certification per CTI STD-201. Therefore, these safety related options will not be allowed per the wording of the proposed change.

Other options may be required for environmental reasons such as plume control or noise control. Again, these options are not allowed under CTI STD-201 unless they have been anticipated and covered under the specific certification test program. Custom modifications to comply with specific environmental requirements, if they might affect the air rate, can not be certified under CTI STD-201. Therefore these custom options will not be allowed per the wording of the proposed change, even if the change in air rate is taken into consideration in the design.

It appears to me that the requirement for CTI Certification of cooling towers will be in conflict with worker safety and environmental requirements on a fairly regular basis. I would recommend that the wording be changed to: "Base models of factory assembled cooling towers will be required to be certified by the Cooling

Technology Institute to meet the requirements of CTI STD-201. Custom options added to base cooling tower models for purposes of safe maintenance or to reduce environmental or noise impact are allowed without requiring additional CTI certification of the option. ”

This would allow the use of certified equipment, but also allow site specific modifications for best safety and environmental solutions.

Thank you for considering my recommendation. By the way, EVAPCO, Inc. has a factory in Madera, California which manufactures this type of equipment.

I will follow-up this e-mail with a written letter.

Sincerely,

Tom Bugler

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